

Ronald W. Downs, OSB No. 920530
P.O. Box 12613
Salem, OR 97309-0613
(503) 375-8898; Fax (503) 371-4781
Cell: (503) 780-0847
rdowns@sdao.com

Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LINDA HEDLUND,

Plaintiff,

v.

**BANKS FIRE DISTRICT #13; and FIRE
CHIEF RODNEY LINZ,** in his individual and
representative capacity,

Defendants.

Case No. 3:20-cv-01527-HZ

**DEFENDANTS' OFFER OF
JUDGMENT**

To: Plaintiff Linda Hedlund and her attorneys Dana Sullivan and Kristine Lambert.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendants Banks Fire District #13 and Fire Chief Rodney Linz, hereby offer to allow judgment to be entered against them and in favor of plaintiff in the amount of \$115,001.00, plus reasonable attorney fees and costs then accrued, as determined by the court and as of the date of this offer.

If plaintiff declines to accept this offer, she may become obligated to pay defendants' costs incurred after the making of this offer in the event that plaintiff does not recover a

judgment that is more favorable than this offer of judgment, pursuant to Rule 68(d) of the Federal Rules of Civil Procedure.

To accept this offer, plaintiff must serve written notice of acceptance thereof within fourteen (14) days of the date this offer is made.

This offer of judgment is made for the purposes specified in FRCP 68, and is not to be construed as either an admission that defendants are liable in this action or that the plaintiff has suffered any damage.

DATED this 18th day of August, 2021.

By: *s/Ronald W. Downs*
Ronald W. Downs, OSB # 920530
rdowns@sdao.com
Attorney for Defendants
Banks Fire District #13 and Fire Chief
Rodney Linz

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **Defendants' Offer of Judgment** on the parties listed below, by the method indicated:

DANA L. SULLIVAN dana@baaslaw.com OSB# 944834	MAIL DELIVERY
KRISTINE LAMBERT kristine@baaslaw.com OSB# 010684	FACSIMILE
Buchanan, Angeli, Altschul & Sullivan LLP 921 SW Washington St., Ste. 516 Portland, OR 97205	X E-FILING NOTICE
	X EMAIL
<i>Attorneys for Plaintiff</i>	

DATED this 18th day of August 2021.

By:

s/Ronald W. Downs
Ronald W. Downs
OSB #920530
(Office) (503) 375-8898
(Cell) (503) 780-0847
Attorney for Defendants